

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Boy Scouts of America and Delaware BSA,
LLC,

Debtors.

Case No. 20-10343 (LSS)

Chapter 11
Jointly Administered

**THE ROMAN CATHOLIC AD HOC COMMITTEE'S NOTICE OF DEPOSITION TO
THE BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC RE VOTING**

PLEASE TAKE NOTICE THAT pursuant to Fed. R. Civ. P. Rule 30(b)(6) and Fed. R. Bank. P. 7030 and 9014, The Roman Catholic Ad Hoc Committee shall take the deposition of the Boy Scouts of America and Delaware BSA (collectively, the "Debtors") on the topics described in attached **Exhibit 1**.

The deposition will commence on **January 21, 2022 at 11:00 a.m. (Eastern Time)**, or at such other date and time as the parties may agree, and will proceed in remotely via video conference.

The deposition shall be taken upon oral examination before an officer authorized by law to administer oaths and shall be recorded by videographic and/or stenographic means.

[Remainder of Page Intentionally Left Blank]

Dated: January 13, 2022
Wilmington, Delaware

POTTER ANDERSON & CORROON LLP

/s/ Jeremy W. Ryan

Jeremy W. Ryan (Bar No. 4057)
Aaron H. Stulman (Bar No. 5807)
1313 N. Market Street, 6th Floor
Wilmington, DE 19801-6108
Telephone: (302) 984-6000
Facsimile: (302) 658-1192
Email: jryan@potteranderson.com
astulman@potteranderson.com

- and -

SCHIFF HARDIN LLP

Everett Cygal, *admitted pro hac vice*
David Spector, *admitted pro hac vice*
J. Mark Fisher, *admitted pro hac vice*
Neil Lloyd, *admitted pro hac vice*
Daniel Schufreider, *admitted pro hac vice*
Jin Yan, *admitted pro hac vice*
233 South Wacker Drive, Suite 7100
Chicago, IL 60606
Telephone: (312) 258-5500
Facsimile: (312) 258-5600
Email: ecygal@schiffhardin.com
dspector@schiffhardin.com
mfisher@schiffhardin.com
nlloyd@schiffhardin.com
dschufreider@schiffhardin.com
jyan@schiffhardin.com

*Counsel to the Roman Catholic Ad Hoc
Committee*

EXHIBIT 1

Definitions

1. The terms “all,” “any,” and “each” shall be construed as encompassing any and all. The singular shall include the plural and vice versa; the terms “and” or “or” shall be both conjunctive and disjunctive; and the term “including” means “including without limitation.” The present tense shall be construed to include past tense, and the past tense shall be construed to include present tense.

2. Capitalized terms not otherwise defined herein shall have the same meanings set forth in the Plan.

3. “Ballot” shall have the meaning ascribed to it in the Solicitation Order.

4. “Chapter 11 Cases” means the bankruptcy cases jointly administered under *In re Boy Scouts of America*, Case No. 20-10343 (LSS) in the United States Bankruptcy Court for the District of Delaware.

5. “Claim” shall have the meaning ascribed to it in the Disclosure Statement.

6. “Communications” shall mean inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, telephone conversations, letters, notes, correspondence, memoranda, emails, facsimile transmissions, or other form of verbal, written, mechanical, or electronic transmissions, in Your actual or constructive control or custody or in the control or custody of any current or former affiliates, representatives or advisors.

7. “Concerning” means relating to, evidencing, supporting, negating, refuting, embodying, containing, memorializing, comprising, reflecting, analyzing, constituting, describing, identifying, referring to, discussing, indicating, connected with or otherwise pertaining in any way, in whole or in part, to the subject matter being referenced.

8. “Debtors” means, collectively or individually, as context requires, the Boy Scouts of America and Delaware BSA, LLC, and each of their agents, accountants, financial advisors, employees, experts, attorneys, officers, directors, direct or indirect shareholders, members, representatives, affiliates, subsidiaries, predecessors, and/or successors.

9. “Disclosure Statement” shall mean the *Amended Disclosure Statement for the Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC* [Dockets No. 6445], and such Document may be amended, supplemented, or modified from time to time.

10. “Documents” shall mean any writings, recordings, electronic files and mails, or photographs, whether original or duplicate, as defined in Federal Rule of Evidence 1001 and Federal Rule of Civil Procedure 34(a), inclusively, including (but not limited to) all Documents and information in Your possession, custody, or control, and includes: all and any written, recorded, or graphic material, however produced or reproduced, minutes, summaries, memoranda, transcripts, tapes, or other voice recordings, and all other Documents and tangible things, including booklets, brochures, pamphlets, circulars, notices, periodicals, papers, records, contracts, agreements, photographs, minutes, memoranda, messages, appraisals, analyses, reports, files, interoffice memoranda, or interoffice communications of any description, calculations, invoices, accounting entries, diary entries, calendars, inventory sheets, ledgers, correspondence, emails, phone recordings, instant messages, text messages, advertisements, press releases, notes, letters, diaries, working papers, schedules, projections, graphs, charts, films, tapes, printouts, and all other data, whether recorded by electronic or other means, and all drafts thereof. “Documents” always includes Communications.

11. “Omni” shall mean Omni Agent Solutions and each of its agents, accountants, financial advisors, employees, experts, attorneys, officers, directors, direct or indirect shareholders, members, representatives, affiliates, subsidiaries, predecessors, and/or successors.

12. “Person” shall have the meaning ascribed to it in the Plan.

13. “Plan” shall mean the *Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC* [Docket No. 6443], as such Document may be amended, supplemented, or modified from time to time.

14. “Solicitation Order” shall mean the *Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief* [Docket No. 6438].

15. “You” or “Your” and variants thereof shall mean the Debtors or each of them.

Deposition Topics

1. All Documents and Communications Concerning voting on the Plan in these Chapter 11 Cases.

2. All Documents and Communications between You and any other Person Concerning Ballots in Class 9.

3. Any instruction You provided to any Person Concerning voting in these Chapter 11 Cases.

4. All Documents and Communications between You and Omni Concerning voting in these Chapter 11 Cases.

5. All efforts You made to ensure the integrity and accuracy of the voting process in these Chapter 11 Cases.

6. All facts Concerning any issues with respect to the integrity and accuracy of the voting process on the Plan in these Chapter 11 Cases.

7. All Documents and Communications You drafted, sent, received, delivered, or transmitted Concerning any questions, concerns, confusion, uncertainty, or alleged improper conduct Concerning voting in these Chapter 11 Cases.

8. All facts Concerning the integrity and accuracy of the voting process in these Chapter 11 Cases.

9. All facts Concerning any alleged actions by any other Person to compromise the integrity and accuracy of the voting process in these Chapter 11 Cases.

10. All Documents and Communications you received from Omni Concerning any alleged integrity or accuracy issues with respect to the voting process in these Chapter 11 Cases.

11. All Documents and Communications you received from any Person Concerning any alleged integrity or accuracy issues with respect to the voting process in these Chapter 11 Cases.

CERTIFICATE OF SERVICE

I, Jeremy W. Ryan do hereby certify that on January 13, 2022, a copy of the foregoing **The Roman Catholic Ad Hoc Committee's Notice of Deposition to the Boy Scouts of America and Delaware BSA, LLC Re Voting** was served on the parties listed via email.

/s/ Jeremy W. Ryan

Jeremy Ryan (No. 4057)

CH2:25416567.1

In re Boy Scouts of America and Delaware BSA, LLC
Revised Participating Parties List

BSA

Jessica C. Lauria	jessica.lauria@whitecase.com
Michael C Andolina	mandolina@whitecase.com
Matthew Linder	mlinder@whitecase.com
Laura E. Baccash	laura.baccash@whitecase.com
Blair M. Warner	blair.warner@whitecase.com
Samuel Hershey	sam.hershey@whitecase.com
Glenn Kurtz	gkurtz@whitecase.com
Robert Tiedemann	rtiedemann@whitecase.com
Andrew Hammond	ahammond@whitecase.com
Jennifer Thomas	Jennifer.thomas@whitecase.com
Doah Kim	doah.kim@whitecase.com
Ronald Gorsich	rgorsich@whitecase.com
Derek Abbott	DAbbott@morrisnichols.com
Andrew Remming	aremming@morrisnichols.com
Paige Topper	ptopper@morrisnichols.com
Tori Remington	tremington@morrisnichols.com
Ernest Martin	Ernest.Martin@haynesboone.com
Adrian Azer	Adrian.Azer@haynesboone.com

U.S. Trustee

David L. Buchbinder	david.l.buchbinder@usdoj.gov
Hanna Mufson McCollum	hannah.mccollum@usdoj.gov

Tort Claimants' Committee

James Stang	jstang@pszjlaw.com
Rob Orgel	rorgel@pszjlaw.com
John A. Morris	jmorris@pszjlaw.com
John W. Lucas	jlucas@pszjlaw.com
Linda Cantor	lcantor@pszjlaw.com
James O'Neill	joneill@pszjlaw.com
Debra Grassgreen	dgrassgreen@pszjlaw.com
Ken Brown	kbrown@pszjlaw.com
Malhar S. Pagay	mpagay@pszjlaw.com
Richard M. Pachulski	rpachulski@pszjlaw.com
Alan J. Kornfeld	akornfeld@pszjlaw.com

Ad Hoc Committee of Local Councils

Richard G. Mason	RGMason@WLRK.com
Douglas K. Mayer	DKMayer@WLRK.com
Joseph C. Celentino	JCCelentino@WLRK.com
Mitchell Levy	MSLevy@wlrk.com

Creditors' Committee

Thomas Moers Mayer
Rachael Ringer
Jennifer Sharret
Megan Wasson
Natan Hammerman
Mark Eckar
Kurt Gwynne

TMayer@kramerlevin.com
rringer@kramerlevin.com
jsharret@kramerlevin.com
mwasson@kramerlevin.com
nhamerman@kramerlevin.com
meckard@reedsmith.com
kgwynne@reedsmith.com

Future Claimants' Representative

Robert Brady
Edwin Harron
Sharon Zieg
Erin Edwards
Kenneth Enos
Kevin Guerke
Ashley Jacobs
Jared Kochenash
Sara Beth Kohut
Rachel Jennings
Meredith Neely
Kami Quinn
W. Hunter Winstead
Emily Grim

rbrady@ycst.com
eharron@ycst.com
szieg@ycst.com
eedwards@ycst.com
kenos@ycst.com
kguerke@ycst.com
ajacobs@ycst.com
jkochenash@ycst.com
skohut@ycst.com
jenningsr@gilbertlegal.com
neelym@gilbertlegal.com
quinnk@gilbertlegal.com
winsteadh@gilbertlegal.com
grime@gilbertlegal.com

Coalition of Abused Scouts for Justice

D. Cameron Moxley
David Molton
Sunni Beville
Tristan Axelrod
Barbara J. Kelly
Gerard Cicero
Eric Goodman
Rachel Merksy

cmoxley@brownrudnick.com
dmolton@brownrudnick.com
sbeville@brownrudnick.com
taxelrod@brownrudnick.com
bkelly@brownrudnick.com
gcicero@brownrudnick.com
egoodman@brownrudnick.com
rmersky@monlaw.com

JPMorgan Chase Bank, N.A.

Kristian Gluck
John Heath
Sarah Cornelia
Steven Zelin
John Singh
Scott Meyerson
Lukas Schwarzmam

kristian.gluck@nortonrosefulbright.com
john.heath@nortonrosefulbright.com
sarah.cornelia@nortonrosefulbright.com
zelin@pjtpartners.com
singhj@pjtpartners.com
meyerson@pjtpartners.com
lukas.schwarzmam@pjtpartners.com

The Church of Jesus Christ of Latter-day Saints, a Utah Corporation sole

Jeff Bjork	jeff.bjork@lw.com
Robert Malionek	Robert.malionek@lw.com
Deniz Irgi	deniz.irgi@lw.com
Adam Goldberg	adam.goldberg@lw.com
Blake Denton	Blake.Denton@lw.com
Amy Quartarolo	Amy.Quartarolo@lw.com
Benjamin Dozier	Benjamin.Butzin-Dozier@lw.com
Sohom Datta	Sohom.Datta@lw.com
Natasha BronnSchrier	natasha.bronnschrier@lw.com
Ryan Jones	ryan.jones@lw.com
Michael Merchant	merchant@rlf.com
Brett Haywood	haywood@rlf.com

United Methodist Ad Hoc Committee

Ed Rice	erice@bradley.com
Elizabeth Brusa	ebrusa@bradley.com

Roman Catholic Ad Hoc Committee Catholic Mutual Relief Society of America

Everett Cygal	ecygal@schiffhardin.com
Mark Fisher	mfisher@schiffhardin.com
Daniel Schufreider	dschufreider@schiffhardin.com
Jin Yan	jyan@schiffhardin.com
Jeremy Ryan	jryan@potteranderson.com
Aaron H. Stulman	astulman@potteranderson.com

The Episcopal Church and Domestic and Foreign Missionary Society of the Protestant Episcopal Church in the United States of America

Mark Salzberg	mark.salzberg@squirepb.com
---------------	--

Roman Catholic Diocese of Brooklyn, New York, Roman Catholic Archbishop of Los Angeles, a corporation sole, Roman Catholic Diocese of Dallas, a Texas nonprofit corporation, Archdiocese of Galveston-Houston, and Diocese of Austin

Patrick A. Jackson	patrick.jackson@faegredrinker.com
Ian J. Bambrick	ian.bambrick@faegredrinker.com

Zalkin Law Firm, P.C. and Pfau Cochran Vertetis Amala PLLC, representative group for various state court counsel

Daniel Bussel	dbussel@ktbslaw.com
Thomas Patterson	tpatterson@ktbslaw.com
Sasha Gurvitz	sgurvitz@ktbslaw.com
Roberty Pfister	rpfister@ktbslaw.com
Michal Horton	mhorton@michaelhortonlaw.com

Agricultural Insurance Company

Bruce W. McCullough	bmccullough@bodellbove.com
---------------------	--

Bruce D. Celebrezze
Conrad Krebs
David Christian

bruce.celebrezze@clydeco.us
konrad.krebs@clydeco.us
dchristian@dca.law

AIG (National Union Fire Insurance Company, Lexington Insurance Company, Landmark Insurance Company, and the Insurance Company of the State of Pennsylvania)

Susan Gummow
Tracey Jordan
Michael Rosenthal
Deirdre Richards
Matthew Bouslog
James Hallowell
Keith Martorana
Tyler H. Amass
Tyler Andrew Hammond
Amanda George
Dylan S. Cassidy

sgummow@fgppr.com
tjordan@fgppr.com
mrosenthal@gibsondunn.com
drichards@finemanlawfirm.com
mbouslog@gibsondunn.com
jhallowell@gibsondunn.com
kmartorana@gibsondunn.com
tamass@gibsondunn.com
thammond@gibsondunn.com
ageorge@gibsondunn.com
dcassidy@gibsondunn.com

Allianz Global Risks US Insurance Company

Ryan Smethurst
Margaret Warner
Matthew S. Sorem

rsmethurst@mwe.com
mwarner@mwe.com
msorem@nicolaidesllp.com

American Zurich Insurance Company

Mark Plevin
Tacie Yoon
Rachel Jankowski
Robert Cecil

MPlevin@crowell.com
TYoon@crowell.com
RJankowski@crowell.com
rcecil@trplaw.com

Argonaut Insurance Company and Colony Insurance Company

Laura Archie
Paul Logan
Kathleen K. Kerns
George R. Calhoun

laura.archie@argogroupus.com
plogan@postschell.com
kkerns@postschell.com
george@ifrahlaw.com

Arrowood Indemnity Company

Michael Hrinewski
Lorraine Armenti

mhrinewski@coughlinduffy.com
LArmenti@coughlinduffy.com

Aspen Insurance Holdings Limited

Clay Wilson

cwilkerson@brownsims.com

AXA XL

Jonathan Mulvihill
Lloyd A. Gura
Pamela Minetto
Kathleen Miller

Jonathan.mulvihill@axaxl.com
lgura@moundcotton.com
pminetto@moundcotton.com
kmiller@skjlaw.com

Ategrity Specialty

John Morgenstern
Matthew Szwajkowski
Carl "Chuck" Kunz, III

jmorgenstern@ohaganmeyer.com
mszwajkowski@ohaganmeyer.com
ckunz@morrisjames.com

Berkley Custom

John Baay

jbaay@glllaw.com

Berkeley Research Group

Matthew Babcock

MBabcock@thinkbrg.com

Clarendon America Insurance Company

Kenya Spivey
Harry Lee
Brett Grindrod
John O'Connor
Nailah Ogle
Matthew Summers

Kenya.Spivey@enstargroup.com
hlee@steptoe.com
bgrindrod@steptoe.com
joconnor@steptoe.com
nogle@steptoe.com
SummersM@ballardspahr.com

Century Indemnity Company

Stamatios Stamoulis
Richard Weinblatt
Tancred Schiavoni
Salvatore J. Cocchiario

Stamoulis@swdelaw.com
weinblatt@swdelaw.com
tschiavoni@omm.com
scocchiaro@omm.com

CNA

Laura McNally
Emily Stone

lmcnally@loeb.com
estone@loeb.com

General Star Indemnity

Gary P. Seligman
Ashley L. Criss
Kathleen Miller

gseligman@wiley.law
acriss@wiley.law
kmiller@skjlaw.com

Hartford Accident and Indemnity Company, First State Insurance Company, Twin City Fire Insurance Company and Navigators Specialty Insurance Company

James P. Ruggeri
Joshua D. Weinberg
Annette Rolain
Sara Hunkler
Phil Anker
Danielle Spinelli
Joel Millar
Lauren Lifland
Benjamin Loveland
Erin Fay
Gregory Flasser

JRuggeri@ruggirilaw.com
jweinberg@ruggirilaw.com
arolain@ruggirilaw.com
shunkler@ruggirilaw.com
Philip.Anker@wilmerhale.com
Danielle.Spinelli@wilmerhale.com
Joel.Millar@wilmerhale.com
lauren.lifland@wilmerhale.com
Benjamin.loveland@wilmerhale.com
efay@bayardlaw.com
gflasser@bayardlaw.com

Liberty Mutual

Douglas R. Gooding
Jonathan Marshall
Kim V. Marrkand

dgooding@choate.com
jmarshall@choate.com
KMarrkand@mintz.com

Markel

Russell Dennis
Jessica O'Neill
Michael Pankow

russell.dennis@markel.com
Jessica.oneill@markel.com
MPankow@BHFS.com

Maryland Casualty Company, Maryland American General Group, and American General Fire & Casualty Company

Harry Lee
Brett Grindod
Nailah Ogle

HLee@steptoe.com
bgrindod@steptoe.com
nogle@steptoe.com

Munich Re

Thaddeus Weaver
William McGrath

tweaver@dilworthlaw.com
wmcgrath@dilworthlaw.com

National Surety

Todd C Jacobs
John E. Bucheit
David M. Caves
Harris B. Winsberg
David Fournier
Marcy Smith

TJacobs@bradleyriley.com
jbucheit@bradleyriley.com
dcaves@bradleyriley.com
harris.winsberg@troutman.com
david.fournier@troutman.com
marcy.smith@troutman.com

Old Republic Insurance Company

Thomas Dare
Peg Anderson
Adam Hachikian
Kenneth Thomas
Ryan Schultz
Stephen Miller
Carl Kunz, III

tdare@oldrepublic.com
panderson@foxswibel.com
ahachikian@foxswibel.com
kthomas@foxswibel.com
rschultz@foxswibel.com
smiller@morrisjames.com
ckunz@morrisjames.com

Traders and Pacific Insurance Company, Endurance American Specialty Insurance Company, and Endurance American Insurance Company

Joseph Ziemianski
Marla Benedek

jziemianski@cozen.com
mbenedek@cozen.com

Travelers

Scott Myers
Louis Rizzo

SPMyers@travelers.com
lrizzo@regerlaw.com

Notice of Intent Parties

Lujan Claimants

Delia Lujan Wolff
Christopher Loizides

dslwolff@lawguam.com
loizides@loizides.com

**Kentucky Creditors: N.C., K.W., C.F., B.L.,
A.F. and A.S:**

Raeann Warner
Louis Schneider
Tad Thomas

raeann@jcdelaw.com
lou.schneider@thomaslawoffices.com
tad@thomaslawoffices.com

Crew Janci Claimants

Salle Veghte
Morton Branzburg
Peter Janci

sveghte@klehr.com
mbranzburg@klehr.com
peter@crewjanci.com

**Hurley McKenna & Mertz Survivors
(HMM)**

Sally Veghte
Christopher Hurley
Evan Smola

sveghte@klehr.com
churley@hurley-law.com
esmola@hurley-law.com

Lonnie Washburn (*Pro Se*)¹

[REDACTED]

Frank Schwindler (*Pro Se*)

nundawao@gmail.com

Gillispie Claimants

Sally Veghte
Joshua Gillispie
Morton Branzburg

sveghte@klehr.com
josh@greenandgillispie.com
mbranzburg@klehr.com

¹ Contact information for the *pro se* individuals has been provided to the Participating Parties.

Arch Insurance Company

Kathleen Miller
Matthew Hamermesh
Ronald Schiller
Sharon McKee
Elizabeth Dolce

kmiller@skjlaw.com
mah@hangle.com
rschiller@hangle.com
smckee@hangle.com
edolce@hangle.com

Jane Doe

Mark L. Desgrosseilliers
Cindy L. Robinson
Douglas Mahoney

desgross@chipmanbrown.com
crobinson@robinsonmahoney.com;
dmahoney@robinsonmahoney.com

Dumas & Vaughn, LLC Claimants

David M. Klauder
Ashley L. Vaughn

dklauder@bk-legal.com
ashley@dumasandvaughn.com